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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
LETTER BRIEF MOVING TO COMPEL
AND STRIKE SONOS'S
INFRINGEMENT CONTENTIONS**

28 CASE No. 3:20-cv-06754-WHA

DECLARATION OF LINDSAY COOPER IN SUPPORT OF GOOGLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL PORTIONS OF ITS LETTER BRIEF MOVING TO COMPEL AND
STRIKE SONOS'S INFRINGEMENT CONTENTIONS

I, Lindsay Cooper, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Letter Brief Moving to Compel and Strike Sonos’s Infringement Contentions (“Google’s Administrative Motion”). If called as a witness, I could and would testify competently to the information contained herein.

2. Google’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 2: Excerpts of Sonos’s Claim Chart for U.S. Patent No. 9,967,615 (“Sonos’s Claim Chart for the ’615 Patent”)	Entire document	Google
Exhibit 3: Excerpts of Google’s November 3, 2021 Letter Regarding Deficiencies in Sonos’s Infringement Contentions (“November 3, 2021 Letter”)	Portions highlighted in yellow	Google
Google’s Letter Brief	Portions highlighted in yellow	Google

3. Sonos’s Claim Chart for the ’615 Patent and the highlighted portions of Google’s November 3, 2021 Letter and Letter Brief detail the operation of functionalities Sonos accuses of infringement. All three documents contain highly confidential and proprietary information regarding sensitive features of Google’s system designs. The chart also cites to Google-produced internal documents that describe the operation of functionalities accused of infringement. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Public disclosure of such information could lead to competitive harm to Google as competitors may alter their systems and practices relating to competing products. Thus, Google has good cause to seal Sonos’s Claim Chart for the ’615 Patent and the highlighted portions of Google’s November 3, 2021 Letter and Google’s Letter Brief.

1 I declare under penalty of perjury that to the best of my knowledge the foregoing is true and
2 correct. Executed on December 17, 2021, in Mill Valley, California.

3 DATED: December 17, 2021

4 By: /s/ Lindsay Cooper
5 Lindsay Cooper
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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lindsay Cooper has concurred in the aforementioned filing.

DATED: December 17, 2021

/s/ Charles K. Verhoeven

Charles K. Verhoeven